June 16, 2005

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USDA – APHIS
4700 River Road, Unit 43
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RE: Agency Docket Number 05-015-01
        Docket ID: APHIS- 2005-0044
        Title: National Animal Identification

Dear Administrator:

Michigan Farm Bureau (MFB) appreciates the opportunity to provide comments on the draft program standards for the National Animal Identification System. MFB is the state's largest general farm organization with over 46,000 farm family members.

The development and implementation of a National Animal Identification System is critical to the United States livestock industry in order to achieve a successful animal disease tracking and monitoring system. In the event of a foreign animal disease outbreak it is imperative that we control, contain and eradicate the disease. In order to do this we must be able to track animal movement through an effective and reliable means.

The implementation of a National Animal Identification System must be done in a timely manner. The United States is lagging behind other livestock production areas around the world in the area of animal identification. It is imperative we move forward in a swift fashion to achieve the proposed program standard. In an effort to do this, the program must be mandatory. A mandatory system is the only way to assure participation by the entire industry. <u>A mandatory program, however, does not come without cost or concern.</u>

It is estimated the annual cost of a National Animal Identification System could be as much as $100 million. If this program becomes mandatory it is the responsibility of those requiring the mandate to fund it. The livestock industry/producers cannot and should not bear the cost of establishing and/or maintaining a mandated National Animal Identification System.
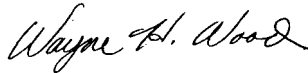
As we move forward with the implementation of a National Animal Identification System we must give critical thought to the infrastructure and how it will be managed. The system must be useable, reliable and flexible. It must be adaptable to farm and ranch life, useable in stockyards and sale facilities, and highly technical enough to ensure disease tracking in a timely manner. <u>Producer information must be held confidential and only used in the event of a disease outbreak.</u> It is extremely important that all producer information be held in privacy and must be protected from public disclosure under the Freedom of Information Act. The program must clearly indicate which state and federal agencies have access to producer data.

The U.S. livestock industry relies upon a network of critical segments from producer to processor to retailer and consumer in order to be successful. Each segment is crucial in the overall success of the industry, and each segment has a level of liability associated with it. The liability for the livestock industry should begin and end with the animal identification and tracking system. <u>Producers need to be protected from unintended consequences of this proposed system</u>. Livestock need to be identified before leaving the producer's premise and entering commerce, regardless of age. This is the only way to truly track an animal in the event of a disease outbreak. The identification of the animal and transfer of ownership through the production phase and until the terminal endpoint, will be a critical responsibility of the livestock production and marketing segments if the program is to be a success.

Finally, as the system is finalized and implementation occurs, it would behoove USDA-APHIS to continue to utilize producer input. The most workable solutions to structural change within any industry are best developed by those impacted. The National Animal Identification System will be more workable, acceptable and easily implemented if those who it will impact have buy-in and ownership.

Thank you for the opportunity to provide these comments.

Sincerely,

Wayne H. Wood
President

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